

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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ACCESS 4 ALL, INC., a Not-for-Profit  
Corporation, and FELIX ESPOSITO,  
Individually,

Plaintiffs,

Case No.: 04-cv-12347

v.

DELANCEY CLINTON ASSOCIATES, L.P., a  
Pennsylvania Limited Partnership,

**MOTION OF THE PLAINTIFF TO  
PERMIT COUNSEL TO APPEAR  
PRO HAC VICE**

Defendant.

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In accordance with 83.5.3(b) of the Local Rules of the United States District Court District of Massachusetts that governs the admission and practice of attorneys in said District Court, the undersigned respectfully moves for the admission of Tracie L. Dickerson, Esquire, 12000 Biscayne Blvd., Suite 609, North Miami, Florida 33181, (305) 891-5199, for purposes of appearing as counsel on behalf of Plaintiff, George Iverson, in the above-styled case.

Tracie L. Dickerson certified herewith that she has studied the Local Rules of this Court and is a member in good standing of the Florida Bar; and is admitted to the United States District Court for the Southern and Middle Districts of Florida, as well as the Southern and Northern Districts of Texas. Ms. Dickerson's Florida Bar Number is 719668. There are no disciplinary proceedings against Ms. Dickerson in any jurisdiction. Certificates of good standing from the Florida Bar and the U.S. District Court for the Southern District of Florida are attached hereto as Exhibit A. Ms. Dickerson is an associate with the law firm of Fuller, Fuller & Associates, P.A. and has been a member of the Florida Bar for one (1) year. An Affidavit of Tracie L. Dickerson

in Support of this Motion to Admit Counsel Pro Hac Vice is attached hereto as Exhibit B.

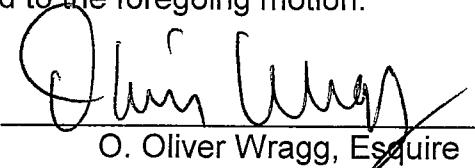
In further support of this motion, it is hereby designated that O. Oliver Wragg is a member of the Bar of this Court. He is also a person to whom the Court and Counsel may readily communicate and upon whom papers may be served.

Ms. Dickerson is familiar with the Local Rules of the United States District Court for the District of Massachusetts and her application for leave to practice in this court is on motion of a member of the bar of this court, who has already appeared as counsel for the Plaintiff, George Iverson. Additionally, Ms. Dickerson has also submitted the required \$50.00 filing fee to the Clerk of the U.S. District Court.

WHEREFORE, the plaintiffs request that this Court grant Tracie L. Dickerson permission to appear before this Court pro hac vice.

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that the Defendant has been consulted and that the counsel for the Defendant has assented to the foregoing motion.

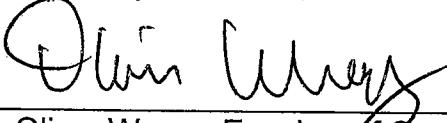


O. Oliver Wragg, Esquire

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been furnished to Michael Colgan Harrington, Esq.; MURTHA CULLINA, LLP; 185 Asylum Street, CitiPlace I; Hartford, CT 06103; via U.S. Mail on this 8<sup>th</sup> day of July, 2005.

Respectfully submitted,



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O. Oliver Wragg, Esquire, *of Counsel* (BBO# 643152)  
FULLER, FULLER AND ASSOCIATES, P.A.  
12000 Biscayne Blvd., Suite 609  
North Miami, Florida 33181  
Tel.: (305) 891-5199  
Fax: (305) 893-9505

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

ACCESS 4 ALL, INC., a Not-for-Profit  
Corporation, and FELIX ESPOSITO,  
Individually,

Plaintiffs,

Case No.: 04-cv-12347

v.

DELANCEY CLINTON ASSOCIATES, L.P., a  
Pennsylvania Limited Partnership,

Defendant.

**ORDER ON MOTION OF  
TRACIE L. DICKERSON TO  
BE ADMITTED PRO HAC VICE**

The motion for admission to practice pro hac vice in the above captioned matter is granted. The admitted attorney TRACIE L. DICKERSON is permitted to argue or try this particular case in whole or in part as counsel or advocate.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission pro hac vice for the above listed case will be made on the roll of attorneys.

The attorney admitted pro hac vice must serve a copy of this Order on all other counsel in this case.

Dated:

\_\_\_\_\_  
United States District Judge

cc: John P. Fuller, Esq.  
Tracie L. Dickerson, Esq.  
O. Oliver Wragg, Esq.  
Michael Harrington, Esq.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

ACCESS 4 ALL, INC., a Not-for-Profit  
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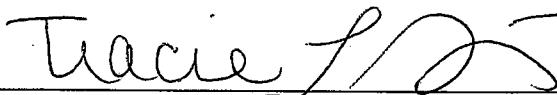
**AFFIDAVIT OF TRACIE L. DICKERSON**

COMES NOW Tracie L. Dickerson and under oath does depose and say as follows:

1. I am a member of the bar in good standing in every jurisdiction where I am admitted to practice.
2. There are no disciplinary proceedings pending against me in any jurisdiction.
3. I am familiar with the Local Rules of the United States District Court of the District of Massachusetts.
4. I am currently actively associated with O. Oliver Wragg, Esq. who is a member of the bar of this Court.

I hereby swear upon penalty of perjury that the foregoing Declaration is true to the best of my knowledge.

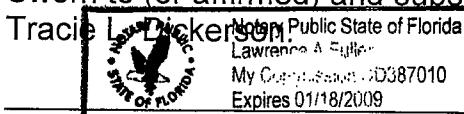
Date: 6/14/05



Tracie L. Dickerson, Esquire

STATE OF FLORIDA  
COUNTY OF Miami-Dade

Sworn to (or affirmed) and subscribed before me this 14 day of June 2005, by



LAWRENCE A. FULLER (print name)

Notary Public

Personally Known  OR Produced Identification \_\_\_\_\_

Type of Identification Produced \_\_\_\_\_

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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ACCESS 4 ALL, INC., a Not-for-Profit  
Corporation, and FELIX ESPOSITO, Individually,

Plaintiffs, Case No.: 04-cv-12347

v.

DELANCEY CLINTON ASSOCIATES, L.P., a  
Pennsylvania Limited Partnership,

**MOTION OF THE PLAINTIFF TO  
PERMIT COUNSEL TO APPEAR  
PRO HAC VICE**

Defendant.

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In accordance with 83.5.3(b) of the Local Rules of the United States District Court District of Massachusetts that governs the admission and practice of attorneys in said District Court, the undersigned respectfully moves for the admission of **John P. Fuller, Esquire**, 12000 Biscayne Blvd., Suite 609, North Miami, Florida 33181, (305) 891-5199, for purposes of appearing as counsel on behalf of Plaintiffs, Felix Esposito and Access 4 All, Inc., in the above-styled case.

John P. Fuller certified herewith that he has studied the Local Rules of this Court and is a member in good standing of the Florida Bar; and is admitted to the United States District Court for the Southern, Middle and Northern Districts of Florida, as well as the United States Court of Appeals for the Fifth and Eleventh Circuits. Mr. Fuller's Florida Bar Number is 0276847. There are no disciplinary proceedings against Mr. Fuller in any jurisdiction. A certificate of good standing from the Supervisor, Membership Records of the Florida Bar is attached hereto as Exhibit A. Mr. Fuller is a partner with the law firm of Fuller, Fuller & Associates, P.A. and has been a member of the Florida Bar for over twenty (20) years. An Affidavit of John P. Fuller in Support of this Motion to Admit Counsel Pro Hac Vice is attached hereto as Exhibit B.

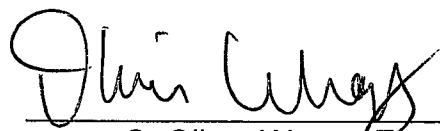
In further support of this motion, it is hereby designated that O. Oliver Wragg is a member of the Bar of this Court. He is also a person to whom the Court and Counsel may readily communicate and upon whom papers may be served.

Mr. Fuller is familiar with the Local Rules of the United States District Court for the District of Massachusetts and his application for leave to practice in this court is on motion of a member of the bar of this court, who has already appeared as counsel for the Plaintiffs, Felix Esposito and Access 4 All, Inc. Additionally, Mr. Fuller has also submitted the required \$50.00 filing fee to the Clerk of the U.S. District Court.

WHEREFORE, the plaintiffs request that this Court grant John P. Fuller permission to appear before this Court pro hac vice.

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that the Defendant has been consulted and that the counsel for the Defendant has assented to the foregoing motion.

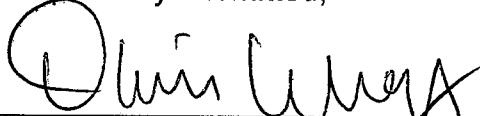


O. Oliver Wragg, Esquire

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been furnished to Michael Colgan Harrington, Esq.; MURTHA CULLINA, LLP; 185 Asylum Street, CitiPlace I; Hartford, CT 06103; via U.S. Mail on this the 8<sup>th</sup> day of July, 2005.

Respectfully submitted,



---

O. Oliver Wragg, Esquire, *of Counsel* (BBO# 643152)  
FULLER, FULLER AND ASSOCIATES, P.A.  
12000 Biscayne Blvd., Suite 609  
North Miami, Florida 33181  
Tel.: (305) 891-5199  
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Plaintiffs,

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v.

DELANCEY CLINTON ASSOCIATES, L.P., a  
Pennsylvania Limited Partnership,

**ORDER ON MOTION OF JOHN  
PAUL FULLER TO BE ADMITTED  
PRO HAC VICE**

Defendant.

---

The motion for admission to practice pro hac vice in the above captioned matter is granted. The admitted attorney JOHN P. FULLER is permitted to argue or try this particular case in whole or in part as counsel or advocate.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission pro hac vice for the above listed case will be made on the roll of attorneys.

The attorney admitted pro hac vice must serve a copy of this Order on all other counsel in this case.

Dated:

---

United States District Judge

cc: John P. Fuller, Esq.  
Tracie L. Dickerson, Esq.  
O. Oliver Wragg, Esq.  
Michael Harrington, Esq.

UNITED STATES DISTRICT COURT  
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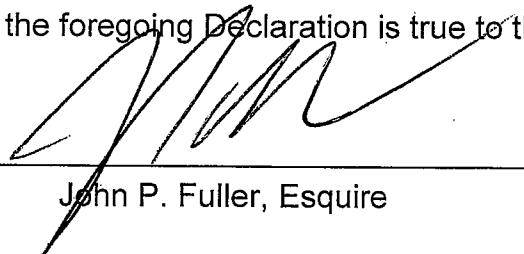
**AFFIDAVIT OF JOHN P. FULLER**

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4. I am currently actively associated with O. Oliver Wragg, Esq. who is a member of the bar of this Court.

I hereby swear upon penalty of perjury that the foregoing Declaration is true to the best of my knowledge.

Date: 6/14/05

  
John P. Fuller, Esquire

STATE OF FLORIDA

COUNTY OF Miami-Dade

Sworn to (or affirmed) and subscribed before me this 14 day of June, 2005, by John P. Fuller, Esq.

  
(signature)

Tracie L. Dickerson (print name)

Notary Public



Personally Known  OR Produced Identification \_\_\_\_\_  
Type of Identification Produced \_\_\_\_\_